

1 Michael Tenenbaum, Esq. (No. 186850)
2 *mt@post.harvard.edu*
THE OFFICE OF MICHAEL TENENBAUM, ESQ.
3 1431 Ocean Ave., Ste. 400
4 Santa Monica, CA 90401
Tel (424) 246-8685
5 Fax (424) 203-4285

6 *Counsel for Plaintiff International Fur Trade Federation*

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10

11 INTERNATIONAL FUR TRADE
12 FEDERATION, an unincorporated
13 association;

14 Plaintiff,

15 - against -
16

17 CITY AND COUNTY OF SAN
18 FRANCISCO; and

19 DR. GRANT COLFAX, an individual, in
20 his official capacity as Director of the
21 San Francisco Department of Public
Health;

22 Defendants.
23
24
25
26
27
28

Case No. 3:20-cv-00242-RS

**STIPULATION AND ORDER
ADJUSTING HEARING AND
BRIEFING SCHEDULE ON
PENDING MOTIONS AS
MODIFIED BY THE COURT**

1 Plaintiff International Fur Trade Federation ("IFF"), Defendants City and County
2 of San Francisco and Grant Colfax, and Intervenor-Defendants The Humane Society of
3 the United States and Animal Legal Defense Fund (collectively, the "Parties"), hereby
4 stipulate as follows:

5 WHEREAS, on April 24, 2020, the Court approved the Parties' stipulation
6 setting the hearing on both Defendants' and Intervenor-Defendants' motions to dismiss
7 (Dkts. 30 & 33) and IFF's cross-motion for summary judgment for July 2, 2020,
8 approving the Parties' proposed briefing schedule, and rescheduling the Initial Case
9 Management Conference to July 16, 2020 (Dkt. 29);

10 WHEREAS counsel for IFF has faced unanticipated difficulties in the preparation
11 of IFF's motion for summary judgment (in addition to dealing with a serious recent
12 medical issue), including delay in obtaining a declaration from a key witness/declarant
13 whose son was just diagnosed with COVID-19 (Declaration of Michael Tenenbaum at
14 1 2);

15 WHEREAS the Parties have conferred by email and cooperated with each other
16 to agree to modify the briefing schedule on IFF's motion for summary judgment, with a
17 new proposed hearing date and Initial Case Management Conference date as set forth
18 below, subject to the Court's discretion and availability (*id.* at 1 3);

19 WHEREAS the Parties continue to believe that their cross-motions should be
20 heard at the same time and that it will conserve the Court's and their resources for the
21 Initial Case Management Conference to be held after their potentially dispositive
22 motions are decided (*id.* at 1 4); and

23 WHEREAS the adjusted schedule will not materially delay the resolution of this
24 case (*id.* at 1 5);

25 NOW, THEREFORE, the Parties further stipulate and respectfully request that
26 the Court for good cause enter an order approving their stipulation as follows:
27
28

1. The hearing on Defendants' and Intervenor-Defendants' motions to dismiss (Dkts. 30 & 34) and on IFF's motion for summary judgment will be on **July 23, 2020**, at 1:30 p.m.;

2. The briefing on IFF's motion for summary judgment shall be as follows:

IFF's opening brief May 22, 2020

Defendants' opposition June 25, 2020

Intervenor-Defendants' opposition June 25, 2020

IFF's reply brief(s) July 9, 2020

3. The Initial Case Management Conference is rescheduled to **August 6, 2020**, at 11:00 a.m. to be held telephonic. All parties shall appear telephonically and must contact Court Conference at (866) 582-6878 at least one week prior to the 12 Conference to arrange their participation. Case Management Statement due July 30, 2020.

Dated: May 22, 2020

/s/ Michael Tenenbaum

Michael Tenenbaum, Esq.

mt@post.harvard.edu

THE OFFICE OF MICHAEL TENENBAUM, ESQ.

Counsel for Plaintiff International Fur Trade Federation

Dated: May 22, 2020

/s/Aileen M. McGrath*

Aileen McGrath, Esq.

aileen.mcgrath@sfcityatty.org

DENNIS J. HERRERA, CITY ATTORNEY

Attorneys for Defendants City and County of San Francisco; and Dr. Grant Colfax, an individual, in his official capacity as Director of the San Francisco Department of Public Health

Dated: May 22, 2020

/s/ Bruce A. Wagman*

Bruce A. Wagman, Esq.

*Attorneys for Intervenor-Defendants The
Humane Society of the United States and Animal
Legal Defense Fund*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 22, 2020



Hon. Richard Seeborg
United States District Judge

* Pursuant to Civil L.R. 5-1(i)(3), the filer of this document attests that concurrence in the filing of the document has been obtained from each of the other electronic signatories hereto.